REMARKS

Drawings

On page 2 of the present office, Figures 2A and 2B have been objected to. Applicants herein submit formal drawings of Figures 1 through 7 and believe that such drawings overcome the objections in the present Office Action.
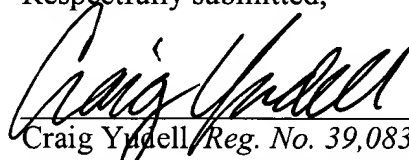
Claim Rejections -- 35 U.S.C. § 103

On page 3 of the present Office Action, claims 1-23 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over *Moy* (U.S. Patent Number 5,425,102) in view of *Guthrie et al.* (U.S. Patent Number 6,161,185). That rejection is respectfully traversed and reconsideration of the claims is requested.

There is recited within independent claims 1, 12 and 23 a step or means for "*transmitting a request for said question utilizing said client computer system in response to an incorrect entry of said primary password, said request including said unique client identifier,*" and further as recited "*transmitting said question utilizing said server computer system in response to a receipt of said request.*" *Moy* teaches a computer security apparatus with password hints that requests questions from the client computer system itself. Consequently, *Moy* has no reason to include a "*unique client identifier*" with such a request. In contrast, *Guthrie* is a personal authentication system for a multiple computer platform where the server presents the challenge to the user as part of the authentication process, and not "*in response to an incorrect entry of said primary password.*" Thus, while *Moy* does suggest an interrogative password method and *Guthrie* does describe an authentication system directed from the server, there is nothing within the references that would suggest the combination as presented in the claims of the present application that permits such interrogative password method to be invoked by the client, but implemented by the server. "The test of whether it would have been obvious to select specific teachings and combine them as did the Applicant must still be met by identification of some suggestion, teaching, or motivation in the prior art, arising from what the prior art would have taught a person of ordinary skill in the field of the invention." *In re Dance*, 160 F.3d 1339, 48 USPQ2d 1635 (Fed. Cir. 1998). "One cannot use hindsight reconstruction to pick and choose among isolated disclosures in the prior art to deprecate the claimed invention." *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596

(Fed. Cir. 1988).

In summary, Applicants respectfully submit that the *Moy* and *Guthrie* references, taken individually or in combination, do not suggest the present invention as claimed in independent claims 1, 12, and 23. In particular, nothing within the references suggests that a request from the client to the server for an interrogative password method should be sent to in response to an incorrect entry of a primary password, where the requests *"including said unique client identifier"* and in response *"transmitting said question utilizing said server computer system in response to a receipt of said request."* Therefore, Applicants respectfully request reconsideration of claims 1, 7-12, 18-23 are pending.

Respectfully submitted,

Craig Yudell/Reg. No. 39,083
BRACEWELL & PATTERSON, L.L.P.
P.O. Box 969
Austin, Texas 78767-0969
Tel.: 512.472.7800
ATTORNEY FOR APPLICANT(S)

Doc ID 131682